Report of the Metrics Subgroup

Mike Green, NASA

May 21, 2008

Interagency Environmental Leadership Workgroup

Overview of Metrics Subgroup Activities

- Review and revise previous EMS metrics elements
- Propose new EMS metrics elements for 2009 and beyond
- Propose new data collection questions
- Questions for discussion

Background

- Current EMS metrics focus on individual EMS (facility-level or organization-level) not on the Agency
- Facility/organization EMS scores roll up to an agency score
- Current EMS metrics assumed in-place
- Need to add / update EMS metrics to meet Executive Order 13423

Review and Revise 7 Current EMS Metrics Elements

- Environmental Aspects
  - minor changes
- Goals, Objectives and Targets
  - minor changes
- Operational Controls
  - minor changes
- Environmental Training
  - minor changes
- Contracts
  - revised to reflect new wording in CEQ *Instructions*
  - replaced
- EMS Audit/Evaluation Procedures
  - minor changes
- Management Review
  - minor changes
    - annual senior leadership review
    - reflect ISO 14001:2004

New EMS Metrics Elements for 2009 and Beyond

- Address New Requirements in EO 13423
  - Managing compliance
  - Integrating sustainable practices into EMS (including energy, water, fleet)
  - Conducting external audit, and declaring EMS to be “fully implemented” (Declaration of Conformance)
- We will also need to update the protocol for aggregating results into red/yellow/green score for the EMS and for the Agency as a whole.

Managing Compliance – New Requirements

- E.O. 13423 requires each agency to establish a program for environmental compliance review and audit *[§ 3.(c)]*
- The CEQ *Instructions* establish that the EMS shall be used to support compliance with environmental and energy regulations *[§ II.A. (1)]*
- ISO 14001:2004 established a new element for “Evaluation of Compliance”

Managing Compliance – Proposed New Metric

D. Facility/organization has established and implemented an environmental compliance program … AND

Facility/organization has identified applicable legal and other requirements … AND

The facility/organization has completed evaluations of compliance with applicable legal and other requirements for the entire facility/organization, in accordance with the established frequency. AND

Corrective actions have been initiated or have been scheduled …

Sustainable Practices in EMS – New Requirements

- E.O. 13423 requires that EMSs shall address the environmental aspects of agency transportation and energy functions.
- The agency shall implement sustainable practices for
  - Improvement in energy efficiency and reduction in greenhouse gas emissions,
  - Use of renewable energy
  - Reduction in water consumption
  - Sustainable acquisition
  - Reduction of the use and disposal of toxic and hazardous chemicals and materials
  - Waste prevention and recycling programs
  - High performance and sustainable buildings
  - Vehicle fleet management
  - Electronics stewardship.

Sustainable Practices – Proposed New Metric

D. Facility/organization has established and implemented requirements/ procedures to address all applicable sustainable practices as required by Executive Order 13423 through the facility/organization's EMS, including setting objectives and targets as appropriate, monitoring, training, and management review; AND Facility/organization has reviewed performance of these sustainable practices through their monitoring and management review process.

Requirements for ‘Fully Implemented’ EMS

Proposed metric addresses the requirements in the CEQ *Instructions* for what constitutes a ‘fully implemented’ EMS under EO 13423 *[§ II.C.(1)]*

1. Formal outside EMS audit conducted within 3 years
2. Audit findings recognized by appropriate management
3. Declaration of conformance issued by appropriate senior manager

Proposed Metric for ‘Fully Implemented’ EMS

- Not Currently in Conformance

  The EMS … has not been declared “fully implemented” in accordance with the requirements of the CEQ Implementing Instructions

  OR

  The EMS has been declared “fully implemented”… BUT The date of initial conformance declaration was more than three years ago, and the EMS has not had been audited within the past three years by a qualified party outside the control or scope of the EMS

Proposed Metric for ‘Fully Implemented’ EMS (cont.)

- Currently In Conformance

  The EMS is “fully implemented” in accordance with the requirements of the CEQ Implementing Instructions

  AND

  If the date of initial conformance declaration was more than three years ago, then the EMS has been audited within the past three years by a qualified party outside the control or scope of the EMS, and the conformance declaration has been renewed as appropriate based on agency guidance.

Reporting the ‘Fully Implemented’ EMS Metric

- This metric is different from the others, and the Metrics Subgroup recommends that it be tabulated and scored separately

Additional Information Collection 2009 and Beyond

New information questions address integration of specific sustainable practices into the EMS

- Does this aspect exist at your facility/organization?
- Is this aspect included in your list of ‘significant aspects’?
- Have you established objectives and targets for this aspect?
- Are these objectives and targets included in your EMS?
- Have you implemented plans and programs to address this aspect?
- Are these plans and programs included in your EMS?

Narrative Questions

The Metrics Subgroup recommends retaining the open-ended narrative questions addressing

- EMS benefits/successes
- EMS best practices
- EMS lessons learned
- EMS challenges
- EMS benefits to agency mission

Issue: Replace or Retain Questions from Previous Years?

- For 2006-2008 information questions addressed
  - Impact of EMS on environmental performance
  - Impact of EMS on the organization

Conclusion

We want your feedback on the recommendation

... on the proposed new metrics

... on the supplementary information questions

Metrics Subgroup Members

Subgroup Members:

- TJ Granito, DHS
- Mike Green, NASA
- Eric Haukdal, DOE (previously HSS)
- John Roland, USDA/USFS
- Ed Pfister, HHS
- Russelle McCollough, USEPA
- Karen Waldvogel, USDA
- Pete Wixted, DOC
- James Wozniak, DLA
- Steve Woodbury, DOE

With the support of:

- Ed Pinero, OFEE (previously)
- Will Garvey, USEPA